## GROUNDWATER MONITORING SYSTEM CERTIFICATION

# **Zimmer Power Station**

**CCR UNIT: Gypsum Recycling Pond** 

AECOM ("Consultant") has been retained by Dynegy Zimmer, LLC to prepare the following assessment of whether the above-referenced coal combustion residuals ("CCR") unit meets the groundwater monitoring system design and construction requirements set out in 40 C.F.R. § 257.91. Presented below are the project background, assessment, limitations, and certification.

#### 1.0 BACKGROUND

Pursuant to 40 C.F.R. § 257.90(b), owners and operators of new and existing CCR landfills, and new and existing CCR surface impoundments, and all lateral expansions of a CCR unit must install the groundwater monitoring system. 40 C.F.R. § 257.91 requires owners and operators of a CCR unit to install a groundwater monitoring system that, relying on site-specific technical information, consists of a sufficient number of wells, installed at appropriate locations and depths, to yield groundwater samples from the uppermost aquifer that accurately represent the quality of background groundwater that has not been affected by leakage from the CCR unit and accurately represent the quality of groundwater passing the waste boundary of the CCR unit.

Pursuant to 40 C.F.R. § 257.91(f), the owner or operator must obtain a certification from a qualified professional engineer stating that the groundwater monitoring system has been designed and constructed to meet the requirements of 40 C.F.R. § 257.91, including the performance standards specified in 40 C.F.R. § 257.91(a), based on the site-specific information specified in 40 C.F.R. § 257.91(b). If the groundwater monitoring system includes only the minimum number of monitoring wells specified in 40 C.F.R. § 257.91(c)(1), the certification must document the basis supporting this determination.

In support of Consultant's assessment, Consultant completed an evaluation of the groundwater monitoring system for the above-referenced CCR unit and determined that sufficient information is available to make the certification required under 40 C.F.R. § 257.91(f).

### 2.0 LIMITATIONS

The signature of Consultant's authorized representative on this document represents that to the best of Consultant's knowledge, information, and belief in the exercise of its professional judgment, it is Consultant's professional opinion that the aforementioned information is accurate as of the date of such signature. Any opinion or decisions by Consultant are made on the basis of Consultant's experience, qualifications, and professional judgment and are not to be construed as warranties or guaranties. In addition, opinions relating to environmental, geologic, and geotechnical conditions or other estimates are based on available data, and actual conditions may vary from those encountered at the times and locations where data are obtained, despite the use of due care.

## 3.0 CERTIFICATION

I, <u>John D. Priebe</u>, being a qualified Registered Professional Engineer, in accordance with the Ohio Professional Engineer's Registration, do hereby certify that the groundwater monitoring system at the **Zimmer Gypsum Recycling Pond** has been designed and constructed to meet the requirements set forth in Section 257.91 of the United States Environmental Protection Agency's Final Rule to Regulate the Disposal of Coal Combustion Residuals from Electric Utilities as Solid Waste under Subtitle D of the Resource Conservation and Recovery Act. This certification is based on review of documentation regarding the design, installation, development, and decommissioning of monitoring wells and piezometers and ancillary measurement, sampling, and analytical devices.

John D. Priebe Professional Engineer (PE-56977

SIGNATURE

DATE 10-17-17

I, <u>Dennis P. Connair</u>, a certified professional geologist, certify that the groundwater monitoring system at the **Zimmer System Recycling Pond** has been designed and constructed to meet the requirements set forth in Section 257.91 of the United States Environmental Protection Agency's Final Rule to Regulate the Disposal of Coal Combustion Residuals from Electric Utilities as Solid Waste under Subtitle D of the Resource Conservation and Recovery Act. This certification is based on review of documentation regarding the design, installation, development, and decommissioning of monitoring wells and piezometers and ancillary measurement, sampling, and analytical devices.

Dennis P. Connair, CPG

Certified Professional Geologist (AIPG #8980)

SIGNATURE

DATE 10-17-17

D John

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